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Via ECF

KERRY S. CULPEPPER *

* ADMITTED TO PRACTICE IN VIRGINIA, HAWAII
AND BEFORE THE USPTO

June 26, 2023

Hon. Tonianne J. Bongiovanni, U.S.M.J.
Clarkson S. Fisher Federal Building
and U.S. Courthouse
402 E. State Street, Room 2020
Trenton, New Jersey 08608

Re: *BODYGUARD PRODUCTIONS, INC., ET AL., v. RCN TELECOM SERVICES OF
MASSACHUSETTS, LLC*, 3:21-cv-15310-FLW-TJB

Dear Judge Bongiovanni,

On May 18, 2023, the Court ordered the Parties to submit a status update on the progress of discovery by June 28, 2023. The Parties request a 30 day extension to Friday July 28, 2023 to provide the status update.

On May 24, 2023, Defendant served a substantial production of documents on May 24, 2023. Plaintiffs' counsel is still reviewing the production. Further, the Parties would like to meet and confer to attempt to resolve any disputes before submitting disputes to the Court. Accordingly, the Parties respectfully submit that there is good cause for a 30 day extension to Friday July 28, 2023 to provide the status update.

Sincerely,

/s/ Eliezer Lekht

Eliezer Lekht, Attorney for Plaintiff

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/ksc/

Kerry S. Culpepper, Attorney for Plaintiff, admitted *pro hac vice*

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So Ordered this 27th day
of June, 2023.

A handwritten signature in black ink, appearing to read "Thomas J. Bongiovanni", written over a horizontal line.